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**From:** [Robert Harrington](#)  
**To:** [Jonathan Goldstein](#); [Chad Pehrson](#)  
**Cc:** [David Osborne](#); [Stephen Richards](#)  
**Subject:** RE: Response to Discovery Requests  
**Date:** Monday, January 13, 2025 7:27:00 PM

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Jonathan:

Thank you for your email. We are obviously willing to work with you to accommodate deposition dates that work for you and your client and on timing and scope on the document productions. But we need to know definitively by this Thursday (January 16) that your clients are willing to produce documents and sit for depositions. Can you please confirm and provide deposition dates? We recognize and reaffirm that we are willing to forego the deposition of Sarah Simkiss provided that we can explore her role and confirm her lack of involvement in the other depositions. If you can't provide us that comfort then we will move to enforce the subpoenas.

I expect you have heard that Plaintiffs' counsel at Venable have refused to stipulate that your clients' depositions can occur after the fact discovery deadline of January 28. We intend to move the court here in Salt Lake City for an extension of time to take your clients' depositions. We would like to tell the court that you have provided us with dates, rather than that you have refused to do so and that we expect to also be required to file an action in Pennsylvania to enforce the subpoenas.

As always, call me if you'd like to discuss. Thanks.

Bobby

801-718-8851

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**From:** Jonathan Goldstein <jgoldstein@goldsteinlp.com>  
**Sent:** Friday, January 10, 2025 1:18 PM  
**To:** Robert Harrington <rharrington@kba.law>; Chad Pehrson <cpehrson@kba.law>  
**Cc:** David Osborne <dosborne@goldsteinlp.com>; Stephen Richards <srichards@kba.law>  
**Subject:** RE: Response to Discovery Requests

- EXTERNAL EMAIL -

Thanks for this letter. I'm shutting down shortly for Shabbos.

I am working to find a time to review the letter with my clients. I hope to be back to you next week with a response to your proposed limitations.

In the meantime, I'm confirming again that I'll be out of the country from January 19<sup>th</sup>,

through and including the 27<sup>th</sup> and neither Mr. nor Mrs. Simkiss will be able to make dates that week work for a deposition.

--

Jonathan S. Goldstein, Esq.

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The best way to reach me is email.

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**From:** Robert Harrington <[rharrington@kba.law](mailto:rharrington@kba.law)>

**Sent:** Wednesday, January 8, 2025 11:43 PM

**To:** Jonathan Goldstein <[jgoldstein@goldsteinlp.com](mailto:jgoldstein@goldsteinlp.com)>; Chad Pehrson <[cpehrson@kba.law](mailto:cpehrson@kba.law)>

**Cc:** David Osborne <[dosborne@goldsteinlp.com](mailto:dosborne@goldsteinlp.com)>; Stephen Richards <[srichards@kba.law](mailto:srichards@kba.law)>

**Subject:** RE: Response to Discovery Requests

Jonathan,

It was nice to speak with you the other day. Please find attached correspondence from our office.

Please let us know about potential deposition dates. I am around tomorrow and Friday if you would like to discuss.

Thanks,

Bobby

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**From:** Jonathan Goldstein <[jgoldstein@goldsteinlp.com](mailto:jgoldstein@goldsteinlp.com)>

**Sent:** Thursday, December 26, 2024 11:54 AM

**To:** Chad Pehrson <[cpehrson@kba.law](mailto:cpehrson@kba.law)>; Robert Harrington <[rharrington@kba.law](mailto:rharrington@kba.law)>

**Cc:** David Osborne <[dosborne@goldsteinlp.com](mailto:dosborne@goldsteinlp.com)>

**Subject:** Response to Discovery Requests

- EXTERNAL EMAIL -

Chad and Bobby,

Please see attached correspondence with regard to your discovery requests to Mr. and

Mrs. Simkiss and to H2E Americas LLC.

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Jonathan S. Goldstein, Esq.

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The best way to reach me is email.